

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

LEHMAN BROTHERS HOLDINGS INC., *et al.*,

Debtors.

x

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Chapter 11

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Case No. 08-13555 (SCC)

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X

**DECLARATION OF CHRISTOPHER J. LUCHT IN SUPPORT OF
LEHMAN BROTHERS HOLDINGS INC.'S MOTION FOR LEAVE TO
AMEND AND EXTEND THE SCOPE OF THE ALTERNATIVE DISPUTE
RESOLUTION PROCEDURES ORDER FOR INDEMNIFICATION
CLAIMS OF THE DEBTORS AGAINST MORTGAGE LOAN SELLERS**

I, Christopher J. Lucht, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that:

1. I am an attorney at the law firm Wollmuth Maher & Deutsch LLP, counsel for Plaintiff Lehman Brothers Holdings Inc. ("LBHI") in the above-captioned proceeding. I am familiar with the facts set forth herein on the basis of my personal knowledge and my review of documents in possession of my firm.

2. I submit this declaration in support of Plaintiff's Motion for Leave to Amend and Extend the Scope of the Alternative Dispute Resolution Procedures Order for Indemnification Claims of the Debtors Against Mortgage Loan Sellers (the "Motion").

3. Annexed hereto as Exhibit A is a true and correct copy of the proposed Second Amended Order in Aid of Alternative Dispute Resolution Procedures for Indemnification Claims of the Debtors Against Mortgage Loan Sellers (the "Second Amended ADR Order").

4. Annexed hereto as Exhibit B is a true and correct copy of the email correspondence from Lani A. Adler to the Court seeking withdrawal from mediation discussions, dated September 8, 2021.

5. Annexed here to as Exhibit C is a true and correct of the Transcript of the Hearing on Trustee's Motion for an Order pursuant to Section 105(a), 502(a), 502(c) and 726 of the Bankruptcy Code and Bankruptcy Rule 3009, dated June 19, 2014.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
October 21, 2021

/s/ Christopher J. Lucht
Christopher J. Lucht